

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☒ COMPLAINT ☐ INFORMATION ☐ INDICTMENT  
☐ SUPERSEDING
**OFFENSE CHARGED**

21 U.S.C. § 843(c)(2)(A) - Advertisement of a Controlled Substance on the Internet

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: Maximum Penalties: 4 years' imprisonment, up to 3 years' supervised release, \$250,000 fine, \$100 special assessment, and forfeiture.

Name of District Court, and/or Judge/Magistrate Location

 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION
**DEFENDANT - U.S.**

CHYNNA LACHAE CROSBY

 DISTRICT COURT NUMBER  
 4:22-mj-70869-MAG
**FILED**

Jul 01 2022

 Mark B. Busby  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND
**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

DEA Special Agent Jeffrey Beckett

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:  
☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

 Name and Office of Person  
 Furnishing Information on this form Stephanie M. Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.  
 Attorney (if assigned) AUSA Maya Karwande
**DEFENDANT****IS NOT IN CUSTODY**
 1) ☒ Has not been arrested, pending outcome this proceeding.  
 If not detained give date any prior summons was served on above charges
2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

**DATE OF ARREST**

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted
**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☒ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☒ Initial Appearance

Defendant Address:

500A Pine Garden Lane, Sacramento, California

Date/Time:

Before Judge: \_\_\_\_\_

Comments:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

## UNITED STATES DISTRICT COURT

for the

Northern District of California

**FILED**

Jul 01 2022

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

United States of America

v.

CHYNNA LACHAE CROSBY

Case No. 4:22-mj-70869-MAG

**FILED UNDER SEAL***Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2020 through October 2020 in the county of Alameda in the  
Northern District of California, the defendant(s) violated:*Code Section*

21 U.S.C. § 843(c)(2)(A)

*Offense Description*

Advertisement of a Controlled Substance on the Internet

Maximum Penalties: 4 years' imprisonment, up to 3 years' supervised  
release, \$250,000 fine, \$100 special assessment, and forfeiture.

This criminal complaint is based on these facts:

Please see the attached affidavit of DEA Special Agent Jeff Beckett

☒ Continued on the attached sheet.Approved as to form Maya Karwande  
AUSA Maya Karwande

/s/ Jeff Beckett

*Complainant's signature*

Jeff Beckett., DEA Special Agent

*Printed name and title*Sworn to before me over the telephone and signed by me  
pursuant to Fed. R. Crim. P. 4.1 and 4(d)Date: June 30, 2022City and state: Oakland, CaliforniaKandis Westmore  
*Judge's signature*

Hon. Kandis A. Westmore, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR COMPLAINT**

I, Jeffrey Desmond Beckett, Special Agent with the Drug Enforcement Administration (DEA), being duly sworn, hereby declare and state the following:

**INTRODUCTION**

1. I make this affidavit in support of an application under Rule 4 of the Federal Rules of Criminal Procedure for a criminal complaint charging Chynna Lachae CROSBY with one count of the unlawful use of the Internet to advertise the sale of, or to offer to sell, distribute, or dispense, a controlled substance in violation of Title 21, United States Code, Section 843(c)(2)(A).

**SOURCES OF INFORMATION**

2. This affidavit is submitted for the limited purpose of securing a criminal complaint and arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts necessary to establish probable cause that the violation of the federal law identified above has occurred.

3. I have based my statements in this affidavit on my training and experience, personal knowledge of the facts and circumstances obtained through my participation in this investigation, information provided by other agents and law enforcement officers, and information provided by, documents, records and databases, and information gained through my training and experience. Where I refer to conversations and events, I often refer to them in substance and in relevant part rather than in their entirety or verbatim, unless otherwise noted. My experience and training as an DEA Special Agent and my participation in this investigation form the basis of the opinions and conclusions set forth below. As this investigation progresses, my understanding of the significance of certain events and evidence may change or evolve.

**AFFIANT BACKGROUND**

4. I am a Special Agent of the Drug Enforcement Administration (“DEA”) and have held this position since September 2017. I am currently assigned to the DEA Resident Office in Oakland, California. I am an “investigative or law enforcement officer of the United States”

within the meaning of 18 U.S.C 2510(7) and am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. 2516.

5. In July 2018, I completed the DEA's eighteen-week specialized law enforcement training course at the DEA's Training Academy in Quantico, Virginia. The training covered all aspects of drug investigations, including the identification of controlled substances, physical and electronic surveillance, utilization of confidential sources, interview techniques, undercover operations, financial investigations, money laundering techniques, and the general operation of drug trafficking organizations.

6. Prior to my employment with the DEA, I was a police officer in New Jersey where I completed 750 hours of New Jersey Police Training Commission training. Upon graduation, I held the position of patrol officer for the Montclair Police Department. Prior to that, I was a police officer in the state of North Carolina. I attended Basic Law Enforcement Training where I received 616 hours of training. Upon graduation, I held the position of patrol officer with the Chapel Hill Police Department. During both employment periods of each police department, I responded to calls for service, enforced the traffic and criminal codes of each state, in addition to conducting written reports for activities conducted during tour of duty.

7. During the course of my law enforcement career, I have participated in numerous drug trafficking investigations. I have participated in multiple interviews with persons involved in drug trafficking. In addition, I have spoken with more experienced law enforcement officers concerning the methods and practices used by drug traffickers. I have participated in many aspects of drug investigations including, but not limited to, controlled purchases of narcotics, physical and electronic surveillance, and the execution of search warrants.

8. From my training, experience, and conversations with other law enforcement officers who conduct drug investigations, I have become familiar with drug traffickers' methods of operation, including, but not limited to, the manufacturing, distribution, storage, and transportation of controlled substances, and the ways in which various controlled substances, including counterfeit prescription pills and fentanyl, are packaged for sale, sold, and ingested.

### **APPLICABLE STATUTES**

9. Under Title 21, United States Code, Section 843(c)(2)(A) it is unlawful for any person “to use the Internet, or cause the Internet to be used, to advertise the sale of, or to offer to sell, distribute, or dispense, a controlled substance where such sale, distribution, or dispensing is not authorized by this subchapter or by the Controlled Substances Import and Export Act [21 U.S.C. 951 et seq.].”

### **FACTS SUPPORTING PROBABLE CAUSE**

10. On August 11, 2020, a 21-year-old Oakland resident was found dead in his apartment. The victim’s mother advised law enforcement that she had received a phone call from one of the victim’s friends on the evening of August 10, 2020. During the call, the friend had stated that the friend was playing video games with the victim online and was speaking with the victim via headset. The friend stated that while they were playing, the victim’s speech sounded slurred. The victim’s mother had tried to call the victim but was not able to make contact. An autopsy determined that the victim died from an accidental overdose from acute fentanyl and alprazolam intoxication. There were 13 NG/ML of fentanyl in the victim’s blood. I know based on my training and experience that that is a potentially toxic amount of fentanyl. I also know that alprazolam is a controlled substance, specifically a benzodiazepine, that can be prescribed by a doctor but is often sold illicitly by narcotics traffickers.

11. The victim’s mother was able to access the victim’s cell phone and found conversations in the victim’s Instagram messages with the username “ceeepaysoo” regarding pill purchases. On August 10, 2022, at approximately 5:24 p.m. the victim and “ceeepaysoo” had the following exchange:

**Victim:** “Let me get 3b”

**@ceeepaysoo:** “Wya”

**@ceeepaysoo:** “Same spot?”

**Victim:** “2 actually not 3”

**Victim:** “-----<sup>1</sup> Oakland CA 04604”

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<sup>1</sup> I have removed the exact address to protect the victim’s privacy.

**Victim:** “94603”  
**Victim:** “How long you going to be”  
**@ceeepaysoo:** “15 mins”  
**Victim:** “3 my bad”  
**Victim:** “Wya”  
**Victim:** “Have to leave in a little”  
**@ceeepaysoo:** “I’m getting off the freeway”  
**Victim:** “Ok”  
**@ceeepaysoo:** “From 580”  
**Victim:** “Ok”  
**Victim:** “You have an extra back wood”  
**Victim:** “Loll”  
**@ceeepaysoo:** “Yea lol I got you. 5 mins”  
**Victim:** “Ty”  
**@ceeepaysoo:** “Here”  
**Victim:** “Here I come”

This conversation took place just a few hours before the victim had slurred speech while playing video games with a friend. Based on my training and experience, I believe this interaction to be a conversation between the victim and the Instagram user “ceeepaysoo” about purchasing controlled substances. Based on this conversation, I believe that the Instagram user “ceeepaysoo” provided the victim with illegal narcotics, which the victim then took and which caused the victim to overdose.

12. The victim’s mother saw additional Instagram messages that indicated “ceeepaysoo” had sold the victim “M30s” on other occasions, including on July 16, 2020, shortly before the victim had suffered a previous non-fatal drug overdose. In my training and experience, “M30s” may refer to either legitimate oxycodone 30 milligram pills or, more likely, counterfeit oxycodone pills containing fentanyl. Fentanyl is an opioid that is many times more potent than several other commonly used opioids, including heroin. In recent years, abuse of fentanyl has become a leading cause of overdose deaths in the United States.

13. On November 6, 2020, the Honorable Jacqueline Scott Corley, U.S. Magistrate Judge, issued a federal search warrant for the Instagram account “ceeepaysoo.” The Instagram

records contained numerous stories<sup>2</sup>, photographs, and messages between ceepayasoo and other Instagram users in which ceepayasoo is advertising M30s and “bars” for sale, negotiating prices, and coordinating transactions. In addition to the photo of the pills, some of the stories includes phrases such as “taaap in” or “hit meeee” which in my training and experience means “contact me.” In the direct message conversations, ceepayasoo’s customer’s typically request either M30s or “bars.” Based on my investigation, I believe that “bars” in the context of ceepayasoo’s dealing refers to alprazolam pills. Alprazolam is a Schedule 4 controlled substance commonly known as Xanax. Through my training and experience, and speaking with other experienced law enforcement officers, I know that alprazolam pills are commonly sold amongst narcotics traffickers and are sometimes counterfeit. Counterfeit alprazolam pills are often manufactured with alprazolam, fentanyl and/or acetaminophen.

14. For example, on July 6, 2020, ceepayasoo posted the following Instagram story of



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<sup>2</sup> Instagram has a feature called “Instagram Story” where you can post a photograph(s) and/or video(s) and they stay active on your profile for a period of twenty-four hours, unless deleted before the twenty-four hour time limit expires.



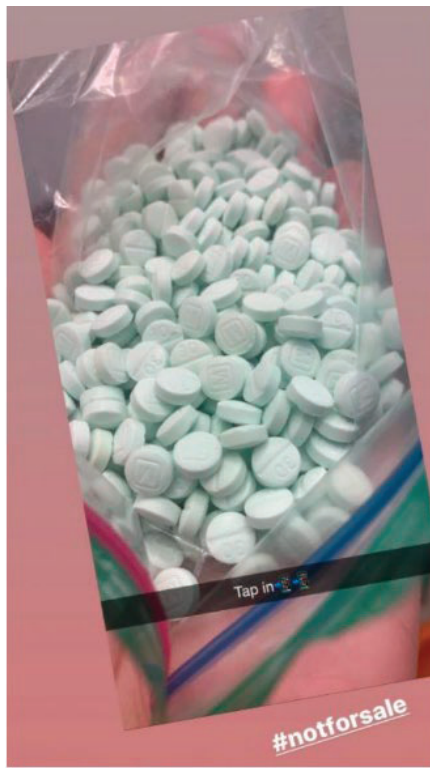
a hand holding a bag of blue bars with the imprint “B707” with the text “Hit meeee” and the hashtag “#notforsale”:

I conducted a search of these pills on [www.drugs.com](http://www.drugs.com) and I found that they are a Schedule 4 controlled substance Alprazolam 2mg. Based on my training and experience I believe that by posting the photograph of the pills along with the text “hit meeee” and the hashtag “#notforsale,” which I believe to be a sarcastic comment, ceepaysoo was advertising the blue alprazolam bars for sale and encouraging people to send her a direct message if they were interested in purchasing the pills.

15. Ceepaysoo posted similar stories on other occasions between June – October of 2020, a few examples are included below:



**June 25, 2020**



**July 13, 2020**



**October 10, 2020**

16. The Instagram story that was posted on June 25, 2020, is a photograph of a bag of blue bar pills with the imprint “B707” with the text “taaap inn.” As discussed above, these pills



are a Schedule 4 controlled substance Alprazolam 2mg. I believe that by posting a photo of the pills with the text “taaap inn,” ceepaysoo is advertising the pills for sale and encouraging other Instagram users to contact her if they are interested in purchasing pills.

17. The Instagram story that was posted on July 13, 2020, is a photograph of a bag of round blue pills with stamp “M” on one side and “30” on the other side and the text “Tap in” and “#notforsale.” Based on my training and experience, I believe that the pills that are pictured in the story posted are counterfeit oxycodone pills known as “M30s.” I am familiar with the physical appearance of counterfeit oxycodone pills: they are blue, round pills with the number “30” imprinted on one side and the letter “M” imprinted on the other side. These pills are consistent with the shape, color, and markings of oxycodone hydrochloride pills dispensed in pharmacies. In my training and experience along with speaking with other law enforcement officers, I believe that these pills to be counterfeit based on what the lack of precision of the imprints on the pills. I also believe these pills to be counterfeit based on them being sold illicitly, generally out of any bag or container that is not a prescription bottle. Based on my training and experience, I believe that ceepaysoo was advertising the M30s for sale and encouraging other Instagram users to contact her if they are interested in purchasing pills.

18. The Instagram Story that was posted on October 10, 2020, is a photograph of a person’s hand and approximately 20-30 yellow pills with the imprint “R039” on them accompanied by the text, “Taaaapp inn.” I conducted a search on [www.drugs.com](http://www.drugs.com) in order to identify the pills. Based on the markings, I believe they are a Schedule 4 controlled substance, alprazolam 2mg. Based on my training and experience, I believe that ceepaysoo was advertising the pills for sale and encouraging other Instagram users to contact her if they are interested in purchasing pills.

19. On August 6 and August 7, 2020, in the days before the August 10, 2022 direct message exchange with the victim, ceepaysoo posted the following two stories:



**August 6, 2020**



**August 7, 2020**

20. The story posted on August 6, 2020, is a photograph of a hand holding approximately 50-60 round blue pills with the stamp "M" on one side and "30" on the other side. As described above, based on my training and experience, I believe that the pills that are pictured in the story posted on August 6, 2020 are counterfeit oxycodone pills known as "M30s." In my training and experience along with speaking with other law enforcement officers, I believe that these pills to be counterfeit based on what the lack of precision of the imprints on the pills. I also believe these pills to be counterfeit based on them being sold illicitly, generally out of any bag or container that is not a prescription bottle. Based on my training and experience and knowledge of this investigation, I believe that by posting a story of a hand holding the M30s, ceepaysoo was advertising the M30s for sale.

21. The story posted on August 7, 2020 is a photograph of a hand holding a plastic bag with approximately 40-50 white bar-shaped pills with the stamp "GG 249" and the text "San

Francisco, California.” After conducting a search of “GG 249” on “Drugs.com,” I found that the stamp “GG 249” is associated with a Schedule 4 controlled substance Alprazolam 2mg. Through my training and experience, and speaking with other experienced law enforcement officers, I know that alprazolam pills are commonly sold amongst narcotics traffickers and are sometimes counterfeit. Based on my training and experience, I believe that based on the appearance of the pills in the photograph, it is likely they are counterfeit. In particular, on one of the pills in the top of the photograph, one of the “G” stamps appears to be backward. In my training and experience, imprecise stamping is a common sign that the pills were manufactured on an illicit pill press and not by a pharmaceutical company. Another sign that these pills are counterfeit is the bag that these pills are being sold in has a cloudy/dusty residue on the inside of it that is due to the pills not being properly pressed. Based on my training and experience and knowledge of the investigation, I believe that by posting a story of the pills, “ceeepaysoo” was advertising the alprazolam “bars” for sale.

22. Based on my investigation, I identified Chynna CROSBY as the user of the “ceeepaysoo” account. On February 22, 2021, federal law enforcement executed a search of CROSBY’s apartment pursuant to a federal warrant. After being read her Miranda rights, CROSBY agreed to be interviewed. During the interview, CROSBY admitted to using her Instagram account “ceeepaysoo” to advertise, offer to sell, and to sell alprazolam bars and M30s, but claimed that any postings or messages related to M30s were not her drugs and instead were on behalf of a friend. CROSBY further admitted to numerous suspected drug deals that were in her Instagram direct messages. CROSBY admitted to knowing the victim and being the driver for all the sales involving the victim. Specifically, CROSBY admitted to driving to the victim’s house on August 10, 2020, but stated that the deal involved M30s and was handled by her friend. CROSBY denied selling the victim alprazolam bars.

23. At the conclusion of the interview, CROSBY was told not to delete any of her social media posts or conversations as they were related to an ongoing federal investigation. During the search of the cell phone that was seized from CROSBY, I noticed that messages were

actively being deleted as I scrolled through the Instagram account “ceeepaysoo.” I then noticed that every post was deleted from the Instagram profile “ceeepaysoo” along with the description in the biography section of the Instagram profile. This indicated to me that CROSBY or someone with her account information had logged into her account from another device and was deleting her account.

**Additional Information about Instagram**

24. Based on my training and experience, I have learned that Instagram owns and operates a free-access social-networking website of the same name that can be accessed at <http://www.instagram.com>. Instagram allows its users to create their own profile pages, which can include a short biography, a photo of themselves, and other information. Users can access Instagram through the Instagram website or by using a special electronic application (“app”) created by the company that allows users to access the service through a mobile device. In order to use Instagram, Instagram requires an internet connection either through wifi or mobile data from the device to post photos or stories, send and receive messages, and view other users’ photos or stories.

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**CONCLUSION**

25. On the basis of my participation in this investigation and the information summarized above, I assert there is probable cause to believe that between on or about June 2020 through at least on or about October 2020, in the Northern District of California, Chynna Lachae CROSBY violated 21 U.S.C. § 843(c)(2)(A) by unlawfully using the Internet to advertise, or to offer to sell or distribute a controlled substance.

/s/ Jeffrey Desmond Beckett  
JEFFREY DESMOND BECKETT  
Special Agent  
Drug Enforcement Administration

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P. 4.1 on this  
30<sup>th</sup> day of June 2022.

  
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THE HONORABLE KANDIS A. WESTMORE  
United States Magistrate Judge